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*Attorneys for Defendants*  
*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF  
LODGING UNDER SEAL BARD'S  
MOTION FOR SUMMARY  
JUDGMENT AS TO PLAINTIFF  
DEBRA MULKEY'S CLAIMS**

DEBRA MULKEY, an individual,

(Assigned to the Honorable David G.  
Campbell)

Plaintiff,

v.

C. R. BARD, INC., a New Jersey  
corporation and BARD PERIPHERAL  
VASCULAR, INC., an Arizona  
corporation,

Defendants.

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, file this Notice of Lodging Under Seal Bard’s Motion for Summary Judgment as to Plaintiff Debra Mulkey’s Claims. Bard’s Motion and Memorandum of Law in Support of Motion for Summary Judgment quotes, references, or characterizes Plaintiff’s personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified Plaintiff of their intent to file this Notice of Lodging. Because the documents lodged under seal and materials lodged redacted only relate to Plaintiff’s personal healthcare information, Defendants note that it is Plaintiff’s burden to file a motion to seal. A list of materials lodged under seal and lodged redacted is attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 28th day of August, 2017.

s/Richard B. North, Jr.  
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**Attorneys for Defendants C. R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.  
Richard B. North, Jr.

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**EXHIBIT A**

**DOCUMENTS PROPOSED TO BE LODGED REDACTED**

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendants' Motion and Memorandum of Law in Support of Motion for Summary Judgment as to Plaintiff Debra Mulkey's Claims

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